

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
f/u/o KERRI ENTERPRISES, the ALLSTATE)
COMPANY INC. a Massachusetts corporation)
with a principal place of business)
in Norwood, Norfolk County)

Plaintiff)

v.)

UNITED STATES FIDELITY &)
GUARANTY COMPANY, a)
Maryland surety company registered to)
business in Massachusetts)

Defendant)

Civil Action No.05-CV-11339-NM

MOTION TO WITHDRAW

COMES NOW, Law Offices of Robert Philip Hilson, counsel to the Plaintiff,
Kerri Enterprises, the Allstate Company Inc., and moves this Honorable Court for leave
to withdraw from representing the Plaintiff in this action.

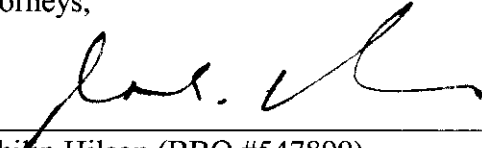
In support thereof, the Plaintiff has failed to meet its financial obligations to its
counsel. To point thereof, the undersigned directs this Court's attention to the Affidav
of Attorney Robert Philip Hilson filed herewith.

WHEREFORE, the Law Offices of Robert Philip Hilson respectfully requests t
this Honorable Court grant Attorney Robert Philip Hilson and Rebecca L. Dalpe and it
office leave to withdraw from representing the Plaintiff, Kerri Enterprises, the Allstate
Company Inc., in this action.

UNITED STATES OF AMERICA
f/u/o KERRI ENTERPRISES,
the ALLSTATE COMPANY INC.,

By its attorneys,

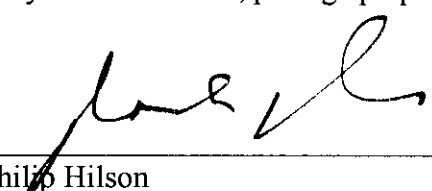
Date: 9.19.5


Robert Philip Hilson (BBO #547899)
Rebecca L. Dalpe (BBO #653996)
Law Offices of Robert Philip Hilson
A Professional Corporation
175 Derby Street, Suite 12
Hingham, Massachusetts 02043
(781) 740-4118

CERTIFICATE OF SERVICE

I, Robert Philip Hilson, counsel to the Plaintiff herein, hereby certify that I serv
a true copy of the within Motion to Withdraw, upon Harvey B. Heafitz, Esq., Heafitz &
Sullivan, 56 Chestnut Hill Avenue, Boston, MA 02135 and Arthur Tenaglia, All State
Painting, 34 Day Street, Norwood, MA 02062, by first-class mail, postage prepaid, on
date set forth below.

Date: 9.19.5


Robert Philip Hilson

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